

WT Docket No. 98-143 COMMENT

In the matter of 1998 biennial Regulatory Review--Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT Docket 98-143

SUMMARY:

Amateur radio license classes should be reduced from 6 to 4. Advanced Class and General Class VE's should be able to administer tests for the General Class. Telegraphy requirements should be minimal (5 WPM) just to meet international requirements. VEC's should not be given authority to question physician's exemptions. Handicapped applicant should not be required to attempt a test for which they have been exempted. Written examinations should put more emphasis on Part 97 and operating procedures and less emphasis on electrical principles and circuits. A new test procedure is recommended. Some typographical errors are noted.

DISCUSSION:

CLASSES: I support the reduction of classes of licenses from 6 to 4. It is confusing to applicants to have to study for two separate tests to achieve the No Code Tech license. It is also confusing to have Tech and Tech Plus licenses.

VEs: I think that General Class VE's should be able to administer the General Class exam, just as an Amateur Extra Class VE can administer the Extra examination. The General Class VE would be administering elements for which they themselves have received credit. It has never been logical to me that the Advanced Class VE could not administer the General exam. Furthermore, most VEC's provide templates and text for grading written and code exams, so expertise is only required if there is a discrepancy in the applicant's mind. I am a VE in Puerto Vallarta Mexico for the cruising fleet. Many of our candidates need to achieve General Class status for reciprocal licenses before they continue their journey beyond Mexico. We have had to cancel test sessions because we were unable to have 3 Extra class VEs available all at one time.

CODE: I support minimal telegraphy for the General Class license to comply with the international Radio Regulations. Telegraphy has been pretty much replaced by digital communications. The U.S. Military no longer requires its recruits to learn Morse Code. I would encourage the elimination of the telegraphy requirement at the WRC in 2001. Those who argue that reducing the code requirements will cause "Citizen's Band Syndrome" are forgetting that HF radio requires the correct answers to at least 70 written questions. Until code requirements are eliminated, VE's should have the option of accepting 1 minute of accurate code copy or a 10 question written quiz of either multiple choice or fill in the blank (or combo) choices. Asking questions on digital technologies does not seem to serve in the interest of those applicants who wish to pursue only phone communications, such as contests. Should higher telegraphy speeds be retained, I support the FCC's position on burdens to examinees. To require those applicants with disabilities to attempt code examinations at higher speeds than 5WPM is punishing to the applicant. Abuse of the physicians statement will not be resolved by harassing legitimate applicants.

No. of Copies rec'd 9 + 6
List ABCDE

I feel strongly that VECs should not be authorized to request medical information. That is a blatant invasion of the applicant's privacy.

QUESTION POOL: More emphasis should be given on Part 97. The current questions do not demonstrate one's ability to operate the newer solid state radios and digital equipment. The subject matter should be expanded to include the standard operating procedures for today's radios. Applicants should be able to answer questions on the meaning of terms such as push to talk (PTT), attenuation, squelch, gain, noise blanker, split frequencies. Also they should be tested on the proper procedure for putting out a call ("Is this frequency in use?") and the proper procedure for signing off ("This is 'full call sign' clearing the frequency"). The solid state radios of today do not require, or are they capable of modification. For this reason the applicant should not be required to demonstrate a thorough knowledge of electrical principles and circuits. This information is no longer relevant.

WRITTEN EXAMINATIONS: Not all amateur operators have the same special interests in joining the amateur radio service. Some want to fly radio controlled airplanes, others want to send packets, others only want to communicate by voice or specialize in moonbounce. For this reason I would propose that the question pools be divided into 3 different tests for each class of license, with no change in the total number of correct answers for a passing score. For example, the question pool for the proposed element 3A is 650 questions. This would yield 3 tests of 215 questions each, but would still only require 48 correct answers for a passing score. This would allow candidates to answer questions in their particular fields of interest. Since scoring is generally done by template, the VE team can simply mark the correct answers until the passing score is reached. For Element 3B the question pool is 300 questions this would yield 3 tests of 100 questions each with 22 correct answers a passing score. Element 4A has a question pool of 500 yielding 3 tests of 165 questions each and a passing score of 37 and Element 4B has a question pool of 400 yielding 3 tests of 130 questions with 30 correct answers for a passing score. If a candidate is unable to reach a passing score after taking 3 tests, they do need further study before further attempts.

TYPOGRAPHICAL ERRORS: These were seen in the ARRL website version of Docket 98-143. 97.301 (c) 15 m -Do- Regions 2 & 3 should read 21.225-21.450 not 21.025. 97.509 (d) last word in. I think this should be in-law. 97.509 (f) ...set may reto...

19 November 1998

From Sara Louise K. Wood, KC6PBT
VE-14939G W5YI, and ARRL

